

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

Alexander E. Jones,

Debtor,

Bankruptcy

Case No. 22-33553 (CML)

Chapter 11

In re

Free Speech Systems LLC,

Debtor,

Bankruptcy

Case No. 22-60043 (CML)

Chapter 11

PRELIMINARY WITNESS LIST FOR CONFIRMATION HEARINGS

Neil Heslin, Scarlett Lewis, Veronique De La Rosa, Leonard Pozner, and the Estate of Marcel Fontaine (collectively, the “Texas Plaintiffs”) preliminarily identify the following witnesses whom they may call to testify at the confirmation hearings in the above-captioned cases, pursuant to the Second Amended Agreed Scheduling Order for Confirmation Hearing [ECF No. 624]. The Texas Plaintiffs reserve the right to amend, revise, or supplement this preliminary witness list.

WITNESSES

The Texas Plaintiffs may call the following witnesses:

1. Alexander E. Jones
2. Robert Schleizer;
3. Patrick Magill;
4. Jeffrey Shulse;

5. A representative for David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto-Parisi, Carlos M. Soto, Jillian Soto Marino, William Aldenberg, William Sherlach, Robert Parker, and Erica L. Ash;
6. Expert witnesses disclosed by the parties in accordance with the case schedule;
7. Any witness listed or called by any other party; and
8. Rebuttal witnesses as necessary.

The Texas Plaintiffs reserve the right to call any witness listed by any other party and any rebuttal witnesses as necessary. The Texas Plaintiffs also reserve the right to cross-examine any witness called by any other party.

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Dated: March 25, 2024

/s/ Jennifer J. Hardy

WILLKIE FARR & GALLAGHER LLP

Jennifer J. Hardy (Texas Bar No. 24096068)
600 Travis Street
Houston, Texas 77002
Telephone: 713-510-1700
Facsimile: 713-510-1799
Email: jhardy2@willkie.com

AND

Rachel C. Strickland (admitted *pro hac vice*)
Stuart R. Lombardi (admitted *pro hac vice*)
Ciara A. Sisco (admitted *pro hac vice*)
787 Seventh Avenue
New York, New York 10019
Telephone: 212-728-8000
Facsimile: 212-728-8111
Email: rstrickland@willkie.com
slombardi@willkie.com
csisco@willkie.com

*Bankruptcy Co-Counsel to the Texas
Plaintiffs*

MCDOWELL HETHERINGTON LLP

Avi Moshenberg (TX Bar No. 24083532)
1001 Fannin Street
Suite 2400
Houston, Texas 77002
Telephone: 713-337-5580
Facsimile: 713-337-8850
Email: avi.moshenberg@mhllp.com

AND

**CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, PC**

Jarrold B. Martin (TX Bar No. 24070221)
1200 Smith Street
Suite 1400
Houston, Texas 77002
Telephone: 713-356-1280
Facsimile: 713-658-2553
Email: jarrod.martin@chamberlainlaw.com

*Bankruptcy Co-Counsel to the Texas
Plaintiffs*

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2024, a true and correct copy of the foregoing was served via the Court's ECF system to the parties registered to receive electronic service.

/s/ Jennifer J. Hardy
Jennifer J. Hardy